

TO BE FILED UNDER SEAL

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

T-NETIX, INC.)	
)	
Plaintiff/Counter-Defendant)	
)	
v.)	
)	
VALUE-ADDED COMMUNICATIONS, INC.)	Case No. 3-05-654-D
)	
Defendant/Counter-Plaintiff)	
v.)	
)	
SECURUS TECHNOLOGIES, INC.)	
)	
Counter-Defendant)	
_____)	

**VALUE-ADDED COMMUNICATIONS, INC.'S
MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Local Rule 79.3, Defendant/Counter-Plaintiff Value-Added Communications, Inc. ("VAC"), by and through undersigned counsel, hereby moves this Court for an Order granting VAC leave to file the following documents under seal:

- (1) Value-Added Communications, Inc.'s Objections to the United States Magistrate's March 28, 2013 Findings, Conclusions and Recommendations, and Memorandum of Law in Support Thereof; and
- (2) Value-Added Communications, Inc.'s Appendix in Support of Objections to the United States Magistrate's March 28, 2013 Findings, Conclusions and Recommendations.

The above-referenced Objections and Appendix are attached hereto as Exhibits 1 and 2, respectively. The documents contain references to certain information that was previously withdrawn, permanently sealed, and expunged from this Court's records. In addition, the

documents contain references to confidential information and documents that are subject to the March 3, 2006 Protective Order entered herein. The sensitive and confidential nature of the information discussed in the Objections and Appendix necessitates a filing under seal, especially given that the United States Magistrate's March 28, 2013 Findings, Conclusions and Recommendations were filed under seal.

WHEREFORE, VAC requests that it be granted leave to file the above-referenced documents under seal.

Respectfully submitted,

COOTER, MANGOLD, DECKELBAUM
& KARAS, LLP

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April 11, 2013

*Attorneys for Defendant/Counter-plaintiff
Value Added Communications, Inc.*

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for VAC has conferred with counsel for T-Netix, Securus, Smith, and Reinhold, and counsel for Gruber Hurst regarding the foregoing motion for leave. T-Netix, Securus, Smith, and Reinhold's counsel and Gruber Hurst's counsel agree to the relief requested in the motion for leave to file under seal.

/s/ Kenneth P. Kula
Kenneth P. Kula

CERTIFICATE OF SERVICE

This is to certify that on April 11, 2013, I electronically submitted the foregoing document with the clerk of the court for the United States District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Dale A. Cooter
Dale A. Cooter